

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING)
PHARMACY, INC., PRODUCTS LIABILITY)
LITIGATION)
) MDL No.: 2419
) Master Docket No.: 1:13-md-2419-FDS
_____)
THIS DOCUMENT RELATES TO:)
)
)
_____) All actions.

JOINT MOTION FOR ENTRY OF ESI PROTOCOL

The Plaintiffs’ Steering Committee (“PSC”), joined by Saint Thomas West Hospital, formerly known as St. Thomas Hospital, Saint Thomas Network, and Saint Thomas Health (collectively, the “Saint Thomas Entities”), Saint Thomas Outpatient Neurosurgical Center, LLC, Howell Allen Clinic, P.C., John W. Culclasure, M.D., Debra V. Schamberg, R.N., Specialty Surgery Center, Crossville, PLLC, and Kenneth R. Lister, M.D., and Kenneth Lister, M.D., P.C. (collectively, the “Tennessee Clinic Defendants”), and UniFirst Corporation (“UniFirst”) move for the Court to enter the attached ESI Protocol to govern the production of Electronically Stored Information in this MDL.

Date: March 10, 2014

Respectfully submitted:

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CERTIFICATE OF SERVICE

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: March 10, 2014

/s/J. Gerard Stranch, IV
J. Gerard Stranch, IV